

Application No. 10/628,749
Amendment dated November 19, 2005
Reply to Office Action of August 19, 2005

Docket No.: 20003-7003

REMARKS

Claims 2–4, 6, 11, 12 and 14–49 are pending. Claims 14, 25, and 43 have been indicated to include allowable subject matter but they were objected as being dependent from rejected claims. All other claims were rejected for various formal and substantive basis as detailed in the Office Action. In light of the amendments presented herein and these comments, these rejections are respectfully asserted to be moot. Further consideration is respectfully requested.

The primary basis of rejection(s) use one or both of Ozawa and/or Oikawa. All the independent claims were amended to expressly differentiate the claimed invention from these references.

The basis of these amendments, and for differentiation, are succinctly described as follows:

A. The cartridge – Element 3 in Oikawa is an “electrode holder” (at least as rendered by the machine translation – the name is not so important as much as the disclosed structure and operation. This element 3 is not disclosed as removable or otherwise detachable from the system. It is believed that implicit in the definition of cartridge is the repeatable removability and reinsertion (or loading/unloading) not considered by the rejection. Thus, certain independent claims reciting the cartridge of the claimed invention have explicitly recited this aspect of the claimed cartridge.

B. The media stripper – The “hand” show in Figure 12 of Oikawa is not labeled arguing that this “structure” is not part of the apparatus. Beyond this aside, the “hand” function and operation is apparently not described in much detail (as evidenced by the machine translation). It is not believed that this “hand” is actually part of the apparatus and that it is not present inside the device during actual operation of the print engine. Thus, certain independent claim reciting the media structure expressly recite that the media stripper is disposed inside a housing containing the transfer engine.

Application No. 10/628,749
Amendment dated November 19, 2005
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Docket No.: 20003-7003

C. The media stripper – The element 11 of Ozawa appears to be a standard roller for pulling individual sheets of a stack of paper into a printing location. The stack of papers described in Ozawa are not releasably secured as described in the specification and recited in the claims. Evidence of this is included within the machine translation of Ozawa which states that "... a sheet does not need a separation means..." (See Paragraph [0041] and throughout in its discussion of frictional forces. Specifically with regard to claim 21, the claim recites both positioning a pad including a plurality of transfer media releasably secured to one another and removing the located one transfer medium from said pad. There is nothing in the disclosure that teaches or suggests that roller 11 satisfies this limitation.

D. Combination of Ozawa and Oikawa – It is respectfully asserted that there is no adequate teaching or suggestion to combine these references, particularly as characterized by the rejection. Ozawa teaches a conventional printer using a stock of individual sheets of paper – a feeder roller (element 11) moves a page in the print path during operation of the print engine. Oikawa teaches a conventional label-paper printer that positions a pad under a print engine so that a top-most page is printed. Then, after the engine moves out of the way, a user removes the printed page. These are two fundamentally different printing solutions and the asserted basis for their combination: "for the advantage of automatically removing the printed transfer media" is respectfully requested to be reconsidered. Oikawa, the primary reference, "removes" the printed transfer media AFTER printing is accomplished. Ozawa cannot teach anything regarding POST-PRINTING removal of a printed page because implicit in the structure and apparatus of Ozawa is that when printing is complete, the page is no longer part of the stack. Ozawa advances a sheet from a stack DURING a printing process, at the conclusion of which the sheet is printed, but also not part of the stack any longer (thus it does not need to be removed and therefore it can offer nothing to Oikawa to solve a desire to "automatically removing the printed media" as included in the rejection. Adding Ozawa

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Docket No.: 20003-7003

to Oikawa would produce a non-functioning unit, non-functioning for different reasons depending upon which features of which disclosure were retained.

Reconsideration of the rejections, particularly in light of the amendments and these comments is respectfully requested.

In view of the above amendment, applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

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